

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

2018 JUL 19 PM 2:53

UNITED STATES OF AMERICA,

Plaintiff,

v.

BILAL A. EL YOUSSEPH,

Defendant.

CASE NO.

2:18 cr 147

JUDGE

Judge Graham

INDICTMENT

21 U.S.C. § 841

18 U.S.C. § 924(c)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT 1

(Possession with Intent to Distribute Alprazolam)

On or about June 4, 2018, in the Southern District of Ohio, Defendant **BILAL A. EL YOUSSEPH** knowingly and intentionally possessed with intent to distribute alprazolam (commonly known as Xanax), a Schedule IV controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(2).

COUNT 2

(Carrying a Firearm During and In Relation to a Drug Trafficking Crime)

On or about the June 4, 2018, in the Southern District of Ohio, Defendant **BILAL A. EL YOUSSEPH** did knowingly carry a firearm—that is, a Sig Sauer Model P226 9-millimeter pistol, bearing serial number 47C041101—during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States—that is, Possession with Intent to Distribute Alprazolam.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

FORFEITURE ALLEGATION A

The allegations of Counts 1 and 2 are incorporated here. As a result of the violation of 21 U.S.C. § 841 set forth in this Indictment, Defendant **BILAL A. EL YOUSSEPH** shall forfeit to the United States of America, under 21 U.S.C. § 853(a)(1) and (2), any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense.

If, as a result of any act or omission of Defendant **BILAL A. EL YOUSSEPH**, the forfeitable property so described, or any portion thereof:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of Defendant **BILAL A. EL YOUSSEPH**, up to the value of the property subject to forfeiture.

Forfeiture in accordance with 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION B

The allegations of Counts 1 and 2 are incorporated here.

Upon conviction of either of the offenses alleged in this Indictment, Defendant **BILAL**

A. EL YOUSSEPH shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to: a Sig Sauer Model P226 9-millimeter pistol, bearing serial number 47C041101; and a Sig Sauer pistol magazine, loaded with 9-millimeter ammunition.


Forfeiture in accordance with 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL

s/ Foreperson

FOREPERSON

**BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY**



PETER K. GLENN-APPELATE (0088708)
Assistant United States Attorney